



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
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March 14, 2006

SENT BY U.S. MAIL
Hon. Gregory M. Sleet
United States District Court
District of Delaware
J. Caleb Boggs Federal Building
844 N. King, Room 4324, Lockbox 19
Wilmington, DE 19801

Re: EEOC v. Nabstar, LLC d/b/a Sleep Inn
Civil Action No. 05-CV-374

Dear Judge Sleet:

On March 10, 2006, the parties in the above referenced case filed a stipulation to extend the discovery deadline in this case for 30 days to April 14, 2006. The stipulation was filed for the reasons set forth below:

1. The parties initially anticipated that a resolution could be reached early in litigation; however, to date, no settlement has been reached despite attempts by Plaintiff to do so.
2. A delay in the exchange of written discovery by Defendant with information pertinent to one of its defenses and Defendant's requests to reschedule deposition dates resulted in the need to request this discovery extension.
3. At this time, Defendant requires a discovery extension in order to take the deposition of the EEOC's Charging Party (the individual on behalf of whom this litigation was brought) on March 17, 2006.
4. As a result of information discovered in recent depositions by Defendant witnesses, the EEOC requires a discovery extension in order to take the depositions of at least two third party witnesses (tentatively scheduled for March 20, 2006.): there is a possibility that Plaintiff may require further depositions within this 30 day extension.

The parties respectfully request that the Court grant this extension for the reasons set forth above. If there is any further information that you require from the Commission, please contact my office.

Sincerely,

/s/ Rachel M. Smith
Rachel M. Smith
Trial Attorney
U.S. EEOC

cc: Kevin J. Connors, Esq.
(by electronic filing)